

# EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**MAKE THE ROAD STATES, INC.,  
NAACP BUCKS COUNTY BRANCH  
2253, BUXMONT UNITARIAN  
UNIVERSALIST FELLOWSHIP,  
and JUAN NAVIA,**

**Plaintiffs,**

**v.**

**FREDERICK A. HARRAN,  
individually and in his official  
capacity as Sheriff of Bucks County,  
and BUCKS COUNTY,**

**Defendants.**

**No. 2:25-cv-02938**

**DECLARATION OF EMILY HOECKER  
IN SUPPORT OF PETITION FOR AWARD OF ATTORNEY'S FEES**

I, Emily Hoecker, am a paralegal working under the attorneys of record for the plaintiffs in the above-captioned case. I make the following declaration upon my personal knowledge:

1. This declaration is submitted in support of Plaintiffs' Petition for Attorneys' Fees.
2. I am a Paralegal of the ACLU of Pennsylvania, where I have worked as a paralegal since August 2023.
3. I earned my undergraduate degree from Northwestern University in December 2019.
4. After my graduation, I worked for 3 years at a criminal defense legal organization in Tulsa, Oklahoma. I acted for 2 years as a Client Advocate, and then 1 year as a Paralegal.
5. I certify that the attached time sheets, which are incorporated by reference, were prepared contemporaneously and maintained in the ordinary course of business.

6. The hours we have billed in this case are fair and reasonable and were necessarily incurred in the successful prosecution of this case.
7. Only the time spent on this case that could reasonably be billed to a private client has been included.
8. Based on my experience, I believe that the requested rate of \$205 per hour is fair and reflects the prevailing community rate for civil rights paralegals of comparable skill and experience.
9. I am a salaried employee of the ACLU of Pennsylvania, a nonprofit, nonpartisan organization dedicated to defending and protecting our individual rights and personal freedoms. We do not charge our clients, and have not done so in this case.  
  
Consequently, I am subject to the “community market rate rule” for determining my fee rate.
10. My hourly rate of \$205 per hour reflects the community market rate for paralegals of comparable skill and experience. This rate is based on knowledge of rates charged by legal nonprofits in Philadelphia with similar levels of experience and educational backgrounds.
11. My total billable hours for the U.S. District Court proceedings in this case are 2.7. The total amount (lodestar), as calculated by multiplying the hours times the prevailing billing rate of \$205, is \$553.50.
12. For the foregoing reasons, I believe that my requested hourly rate of \$205 is fair, reasonable, and well within the scope of rates given to federal court paralegals with similar experience, skill, and standing in the Philadelphia legal community.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 2, 2025

Respectfully submitted,

By: /s/ Emily Hoecker

Emily Hoecker  
AMERICAN CIVIL LIBERTIES UNION  
OF PENNSYLVANIA  
P.O. Box 60173  
Philadelphia, PA 19102  
215-592-1513  
ehoecker@aclupa.org

***Make the Road v. Harran* – Emily Hoecker Paralegal Time - E.D. Pa.**  
**Hourly Rate = \$205**

<b>Date</b>	<b>Description</b>	<b>Time</b>	<b>Amount</b>
06/12/2025	Proofreading and Finalizing Motion to Remand and Supporting Brief and Exhibits	0.90	\$ 184.50
06/12/2025	Filing Motion to Remand Papers in the Eastern District of Pennsylvania	0.30	\$ 61.50
06/24/2025	Cite checking and Proofreading Reply Brief in Support of Motion for Remand	1.20	\$ 246.00
06/24/2025	Filing Reply Brief in Support of Motion for Remand in Eastern District of Pennsylvania	0.30	\$ 61.50
<b>TOTAL</b>		<b>2.70</b>	<b>\$ 553.50</b>